

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

RONALD KOONS, *et al.*,

Plaintiffs,

V.

WILLIAM REYNOLDS, *et al.*,

Defendants.

:
: No. 1:22-cv-07464-RMB-EAP

STIPULATION

WHEREAS, Plaintiffs commenced this action against five official capacity Defendants responsible for enforcing the challenged provisions of Chapter 131 of the 2022 Laws of New Jersey; and

WHEREAS, Attorney General Matthew Platkin and State Police Superintendent Patrick Callahan, represented by the Attorney General’s office, are defending the challenged provisions; and

WHEREAS, Atlantic County Prosecutor William Reynolds, Camden County Prosecutor Grace MacAulay and Acting Sussex County Prosecutor Annemarie Taggart (collectively the “County Prosecutors”) acknowledge and agree that they must comply with the Court’s orders and injunctions regarding the enforcement of Chapter 131 (and the orders or mandates of any other court with jurisdiction), regardless of whether they are parties to this action or not; and further, the County Prosecutors specifically pledge to do so; and

WHEREAS, Plaintiffs have prepared an Amended Complaint that omits the County Prosecutors as Defendants, and as well, challenges additional “sensitive place” restrictions in Chapter 131 and includes one additional Plaintiff,

NOW THEREFORE, it is hereby stipulated, ordered and agreed that:

1. The claims against Defendants Atlantic County Prosecutor William Reynolds, Camden County Prosecutor Grace MacAulay and Acting Sussex County Prosecutor Annemarie Taggart shall be and hereby are DISMISSED without prejudice pursuant to Rule 41(a)(2) of the Federal Rules of Civil Procedure;
2. Plaintiffs will file their Amended Complaint on February 7, 2023 and their pending preliminary injunction motion shall include the additional “sensitive places” challenged therein; and
3. The Court’s temporary restraining order (Doc. No. 35) shall remain in full force and effect, and the parties shall submit their remaining preliminary injunction briefing in accordance with the schedule proposed previously.

It is **SO ORDERED** this _____ day of _____, 2023.

Hon. Renée Marie Bumb
United States District Court Judge

Dated this 7th day of February, 2023

<p>Plaintiffs Ronald Koons, Nick Gaudio, Jeffrey M. Muller, Second Amendment Foundation, Firearms Policy Coalition, Coalition of New Jersey Firearm Owners and New Jersey Second Amendment Society,</p> <p><u>s/ David D. Jensen</u> David D. Jensen David Jensen PLLC 33 Henry Street Beacon, New York 12508 Tel: 212.380.6615 david@djensenpllc.com</p>	<p>Defendants Matthew Platkin and Patrick Callahan and Acting Sussex County Prosecutor Annmarie Taggart,</p> <p><u>s/ Angela Cai</u> Angela Cai Deputy Solicitor General Office of the Attorney General P.O. Box 080 Trenton, New Jersey 08625 Tel: (609) 376-2791 Angela.Cai@njoag.gov</p>
<p>Defendant Atlantic County Prosecutor William Reynolds,</p> <p><u>s/ Alan Cohen</u> Alan Cohen Atlantic County Department of Law 1333 Atlantic Avenue, 8th Floor Atlantic City, NJ 08401 609-343-2279 Cohen_Alan@aclink.org</p>	<p>Defendant Camden County Prosecutor Grace MacAulay,</p> <p><u>s/ Harold Goldberg</u> Howard Goldberg First Assistant County Counsel 520 Market Street, 6th Floor Camden, New Jersey 08102-1375 (856) 225-5543 Howard.Goldberg@camdencounty.com</p>